

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No. 1:24-cv-21136-LEIBOWITZ/TORRES

TUSHBABY, INC.,

Plaintiff,

v.

SHIAON, a Foreign Corporation,

Defendant.

TUSHBABY, INC.,

Plaintiff,

v.

FLEEROSE, a Foreign Corporation,

Defendant.

PLAINTIFF’S NOTICE OF SETTLEMENT

Pursuant to Local Rule 16.4, Plaintiff Tushbaby, Inc. provides notice that it has reached a settlement in principle with Defendants Shiaon and Fleerose (together with Tushbaby, the “settling parties”) to resolve all matters pending before the Court with respect to the settling parties only, including in the consolidated matter *Tushbaby, Inc. v. Fleerose*, No. 1:24-cv-22149-LEIBOWITZ (S.D. Fla.). [See ECF No. 108].

Counsel are in the process of drafting their settlement papers and respectfully request that the Court vacate all pending deadlines¹ while the parties finalize their settlement papers and complete all

¹ The only remaining party is ZOOYEE, which is in default. Tushbaby timely filed a motion for entry of judgment. [ECF No. 135] and therefore, there are no remaining pending deadlines with respect to ZOOYEE.

conditions of settlement. Counsel would ask the Court permit 60 days for the settling parties to complete those matters, at which time the settling parties would file a joint stipulation of dismissal.

The undersigned has provided this notice to counsel for Shiaon and Fleerose prior to filing and their counsel has approved its contents.

Dated: May 6, 2025.

Respectfully submitted,

James M. Slater
James M. Slater (FBN 111779)
ESCA Legal LLC
9000 Dadeland Blvd. #1500
Miami, FL 33156
Tel.: (305) 523-9023
james@esca.legal

Leo M. Lichtman (admitted *pro hac vice*)
ESCA Legal LLC
1117 Sixth Avenue, Fifth Floor
New York, New York 10036
Tel.: (347) 745-2535
leo@esca.legal

Attorneys for Plaintiff Tushbaby, Inc.